UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RCRA Compliance Evaluation Inspection

Ferro Corporation
251 West Wylie Avenue
Washington, PA 15301

Telephone Number: (724) 223-5900

Date of Inspection: 6/18/08

RCRA Identification Number: PAD041731670

EPA Representative:	Clark S. Conover Environmental Scientist RCRA Compliance & Enforcement (304) 231-0502
State Representative:	Shawn Staley Waste Management Specialist Bureau of Waste Management (724) 769-1059
Facility Representatives:	Tin Counihan ISG Manager

Background

On June 18, 2008, EPA's Waste & Chemical Management Division conducted a Compliance Evaluation Inspection under the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. Sections 6901 et seq. of Ferro Corporation located at 251 West Wylie Avenue in Washington, Pennsylvania (Attachment 1). During the initial meetings with Mr. Counihan federal credentials were presented and the authority, purpose, and scope of the inspections were discussed.

The inspection concentrated on the Ferro's compliance with federal and state environmental regulations. All information included in this report are the results of statements by the facility representatives, materials shown to the inspector by facility representatives during the inspection, documents and information provided prior to the final preparation of this report, and a review of EPA and state records. The body of the inspection report consists of a narrative, checklist, and photographs.

General Facility Information

Ferro purchased the facility in 2001 which was originally established in the 1950's. The facility is located in a single building and employs approximately 240 personnel. The plant produces colored glass beads which are used as coloring and labeling on numerous glass products. The glass beads are lithographed onto the glass products such as beer bottles and then when baked the glass beads adhere to the glass product being painted.

Permit Status

This facility is a large quantity generator. The facility does not treat, store, or treat any hazardous waste on site.

Inspection Observations

The inspection began with inspections of the facility's laboratory areas. The first satellite accumulation point inspected was in Room 8A. The laboratory had a single small container of hazardous waste which was in good condition and was closed and labeled as containing hazardous waste (Photo #1). The label on the container was dated March 21, 2006. The second lab inspected was in Room 4A and contained a small satellite accumulation tub of hazardous waste. The tub was closed, appeared to be in good condition and was labeled as containing a hazardous waste and was dated (Photo #2).

The next lab inspected was located in Room 1A and contained a single small satellite accumulation container of waste paste. The container was in good condition, was closed and properly labeled (Photo #3). The final laboratory inspected was in Room 28A and the tub appeared to be in good condition, was closed and labeled as containing glass lead trials (Photo #4).

The next area inspected was the waste water treatment building. The facility treats its waste water. The waste water is treated for neutralization and discharged under permit to the local sanitary sewer. The floor in the waste water treatment area is grated and utilized to collect waste wash water from parts cleaning activities. The wash water is collected in what was described as a self contained sump (Photo #6). The wet sludge in then pumped from the sump into four 750 gallon tanks which is then transferred to a tanker truck and manifested as a hazardous waste (Photo #5). The four tanks were empty during the inspection.

The next area inspected was the less than 90 day storage area. The area contained approximately sixty 55-gallon drums and eight large sacks of hazardous waste (Photos #7 - #10). The drums appeared to be in good condition, were closed and labeled as containing a hazardous waste. The drums were stacked in a manner which precluded proper inspection. There was a single small container of hazardous waste in the less than 90 day storage area which was labeled but was not dated (Photo #11).

The facility generates flourescent light bulbs as a universal waste. The used bulbs were placed in boxes which were labeled as waste lamps (Photo #12 & #13). The next area inspected was Building I. The facility utilized dryers for sludge to drive off the moisture (Photo #14). The next satellite accumulation area was in Bay 8. There were three 55-gallon drums collecting hazardous waste from the Flux Bag House. At the time of the inspection the three drums contained less than 55-gallons total; however, the potential for the accumulation of greater than 55-gallons of waste exists. All three drums were sealed, labeled and appeared to be in good condition (Photo #15). This area also contained three drying ovens (Photo #16) which are utilized to dry the filter presses (Photo #17) in Bay 7.

The next area inspected was Bay 6 which had two satellite accumulation drums collecting waste from Spray Dryer #2 Bag House (Photo #18) and Spray Dryer #1 Bag House (Photo #19). Both drums were closed, appeared to be in good condition, and were labeled as containing hazardous waste. The next area inspected was the maintenance cage. There was a single 55-gallon drum of used oil. The drum appeared to be in good condition, was closed and was labeled as containing "Used Oil" (Photo #20).

The next area inspected was Bay 5. There were three 55-gallon drums of hazardous waste present. The first drum was collecting waste from the Pulverizer Bag House. The drum appeared to be in good condition, was closed and labeled as containing a hazardous waste. The second drum located adjacent to the Pulverizer Bag House collection drum was utilized for the collection of floor sweepings (Photo #21). The drum appeared to be in good condition, was labeled as containing a hazardous waste and was covered with a loose lid. The third 55-gallon drum present in Bay 5 was collecting waste from the Mill Bag House. The drum was closed, appeared to be in good condition and was labeled as containing hazardous waste (Photo #22). There were also three dryer ovens located in this area (Photo #23) and a 25-gallon drum collecting waste from the SSPD Bag House. The white drum appeared to be in good condition and was closed and labeled as containing hazardous waste.

The next area inspected was utilized for small sample production and contained one of three parts washers utilized by the facility (Photo #25). All parts washers utilized at the facility are serviced by Safety Kleen.

The next area inspected was Bay 3 which held the facility's emergency response equipment including fire fighting apparel and SCBAs (Photos #26 & #27). There was a single 55-gallon satellite accumulation container in Bay 3 utilized for the collection of floor sweepings. The drum appeared to be in good condition, was properly labeled and covered with a loose lid (Photo #28). The next area inspected was Bay 2 which had a single satellite accumulation container from the Bag House (Photo #29). The container appeared to be in good condition, was closed and properly labeled.

The next area inspected was Bay 1 which contained three satellite accumulation points. The first was a electronic sweeper utilized for cleaning (Photo #30). The sweeper utilized a 55 gallon drum for waste collection. The drum appeared to be in good condition, was closed and properly labeled. The second satellite accumulation point was for the collection of Bag House dust (Photo #31). The drum appeared to be in good condition, was closed and properly labeled. The third satellite accumulation point in Bay 1 was a drum utilized for the collection of floor sweepings (Photo #32). The drum appeared to be in good condition, was loosely covered and properly labeled.

The next area inspected was Bay 0. Bay 0's Bag House utilized a 55-Gallon drum for the collection of wastes (Photo #33). The drum appeared to be in good condition, was closed and was properly labeled. The next 55-Gallon satellite accumulation drum was for the collection of press line outs. The drum appeared to be in good condition, was not closed (Photo #35), was labeled as containing hazardous waste and was dated January 27, 2008 (Photo #34). Bay 0 also contained a parts cleaner (Photo #36). The facility utilizes several methods of mixing the various compounds which form its products (Photo #37). There was also a second satellite accumulation 55-gallon drum for the collection of press line outs (Photo #38). Bay 0 also had a drum for the collection of waste oils. The drum appeared to be in good condition, was labeled as hazardous waste and was marked "waste oil" (Photo #39).

The next area inspected was Bay 0 Upstairs. This area had two 55-gallon drums utilized for the collection of leaded glass waste (Photo #41). Both drums had loose lids. One drum was full (Photo #40) and the other drum was partially full. Both drums appeared to be in good condition, were properly labeled and neither drum was dated. There was also a 25-gallon drum utilized for the collection of hazardous wastes. The drum appeared to be in good condition, was properly labeled and covered with a loose lid (Photo #42). Bay 0 also contained a single drum being utilized for the collection of waste oil (Photo #43). The drum was not labeled as containing used oil; however, the facility representative properly marked the container during the inspection. Bay 0 is also utilized for liquid organics storage utilized in the formation of the product (Photo #44). Bay 0 also has a series of laboratories. There were three small containers of hazardous waste in the labs (Photos #45 - #47). All three containers appeared to be in good condition, were closed and properly labeled.

The next area inspected was Building M. There were two satellite 55-gallon drums utilized for the storage of lead glass (Photo #48) and floor sweepings (Photo #49). Both drums appeared to be in good condition, were properly labeled and covered with loose lids. The final area inspected was identified as the Lab Sale Production area. This area contained one satellite accumulation drum for the collection of glass. The drum appeared to be in good condition and was closed and properly labeled. This drum has a negative pressure system to ensure the glass dust does not escape.

Subpart AA, BB, CC

The facility does appear to comply with the requirements.

Biennial Report

The last Bi-Annual report was submitted in February 2008 for the 2007 year and documented that Ferro generated a total of 173,137 pounds of hazardous waste in 2007 or approximately 14,428 pounds per month.

Storage Tanks & Containers

The facility utilized 55-gallon drums, tanks and cloth bails for hazardous waste storage. The facility's less than 90 day storage areas is inspected weekly and environmental inspection logs are maintained. The only tank storage reportedly utilized by Ferro are the four 750 gallon tanks utilized for the storage of waste wash water in the waste water treatment area. The tank storage is utilized to temporary hold wash water from the sump in the waste water treatment area. The wash water is pumped into the tanks just prior to being loaded into a tanker truck. The purpose of the tanks is to allow the quick transfer of the contaminated wash water to the tanker truck and thus provides an economic benefit to the facility. The facility does not consider their sump in the waste water treatment area to be a hazardous waste tank.

Manifests

EPA did a review of the facility's manifest system and there were no discrepancies noted.

Training

Records indicated that the Ferro does provide its personnel with sufficient hazardous waste training to meet the requirements of 40CFR § 262.34(a)(4).

Contingency Plan

Ferro's contingency plan was reviewed and determined to meet all requirements of 40 CFR § 262.34(a)(4). The facility is equipped with an internal alarm system and copies of the facility's emergency procedures and facility layout has been provided to local authorities. A copy of the emergency equipment storage locations and evacuation routes is included.

Out-Briefing

The following discrepancies were noted during the out-briefing. The facility has failed to store their hazardous waste in the less than 90 day area in a manner which would allow inspection. The facility failed to date one container of hazardous waste in the less than 90 day area. The facility has also collected greater than 55-gallons of hazardous waste in a satellite accumulation area.

Attachments

1. Map
2. 2007 Hazardous Waste Report

7/1/08
Date

Clark S. Conover

Inspection Checklist

EPA GENERATORS CHECKLIST

Name of Facility: **Ferro Corporation**
Address: **251 West Wylie Avenue**
Washington, Pennsylvania 15301

EPA ID#: **PAD041731670**
Name/Title of
Facility Rep: **Tim Counihan**

I. General:

1. Provide a brief description of the type of operation(s) that produce hazardous waste at the facility: **Ferro purchased the facility in 2001 which was originally established in the 1950's. The facility is located in a single building and employs approximately 240 personnel. The plant produces colored glass beads which are used as coloring and labeling on numerous glass products. The glass beads are lithographed onto the glass products such as beer bottles and then when baked the glass beads adhere to the glass product being painted.**

2. Does this facility perform the following on-site:

a. Storage (greater than 90 days) of hazardous waste: **No**

b. Treatment of hazardous waste: **No**

c. Disposal of hazardous waste: **No**

If yes, complete appropriate TSD checklists.

List the average amount of each type of hazardous waste generated on a monthly basis.

Waste Code	Amount Generated
D006/D007/D008	**6,546 Lbs/Month**
D001/D006/D007/D008	**5,807 Lbs/Month**
D001/F003/D035	**951 Lbs/Month**
D006/D008	**938 Lbs/Month**
D001/F003	**184 Lbs/Month**
D009	**1 Lb/Month**

3. Is the facility subject to any exclusions for its hazardous waste: **No**
If yes, list waste and basis for exclusion

4. Waste Minimization: What has been done facility wide to reduce the volume and or toxicity of the waste generated? **The facility has implemented new mixing methods and is introducing new compounds with less cadmium, lead and chromium.**

5. Does the facility generate any characteristic hazardous waste? **Yes**
If yes, describe how these characteristics were determined, i.e.
testing or knowledge process/material used. **Through analysis/knowledge.**

6. Does this facility contemplate any changes in its operation from a hazardous waste generation or management perspective? **Possibly**
If yes, describe: **Looking to new compounds which will be pollutant free.**

II. Manifest (Complete this section only if facility ships hazardous waste off-site)

262.20(a)
1. Does this facility use the Uniform Hazardous Waste Manifest? **Yes**
If no, describe the system used.

If yes, review a representative number of manifest and indicate whether they contain:

a. Generators name mailing address, telephone number and EPA ID number? **Yes**

b. Transporters name and EPA ID number? **Yes**

c. DOT waste description, including proper shipping name, hazardous waste class and DOT identification numbers? **Yes**

d. Number and type of containers, if applicable? **Yes**

e. Quantity of each waste transported? **Yes**

f. Name, EPA ID number and site address of the facility designated to receive the waste? **Yes**

g. The following certification? **Yes**

"I hereby declare that the contents of this consignment are full and accurately described above by proper shipping name and are classified, packaged, marked, and labeled, and in all respects are in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and environment."

2.2.23(a)
2. Did the generator:

a. Sign and date the manifest? **Yes**

b. Obtain the handwritten signature and the date of acceptance from the initial transporter? **Yes**

c. Ensure the return copies of the manifest from the TSD facility were properly signed and dated? **Yes**

d. Retain a copy of the signed manifest for at least three years? **Yes**

(The inspector should obtain copies of any manifests that are found to have problems)

III. Pre-Transport Requirements

Manifest System: (Complete only if the facility ships hazardous waste off-site)

1. Identify the names and address of off-site facilities which have received waste from this generator. **(Based upon review of the 2008 Bi-Annual Report and manifest review)**

Name: **Envirite of Ohio, Inc.**
Addr: ***2050 Central Avenue***
Canton, Ohio 41707
Phn: **(800) 719-5808**
ID#: ***OH0980568992***

Name: ***Metallix Refining Inc.***
Addr: ***251 Industrial Blvd.***
Greenville, NC 27834
Phn: **(252) 413-0346**
ID#: ***NCD095119210***

Name: ***American Environmental Services, Inc.***
Addr: ***1750 Morgantown Industrial Park***
Morgantown, WV 26505
Phn: **(304) 292-0659**
ID#: ***WVD981107600***

2. Is there any indication that the facility is:

262.30
a. Not packaging its waste in accordance with DOT regulations (49 CFR Parts 173, 178 and 179)? ***No***

262.31
b. Not labeling each package in accordance with DOT regulations (49 CFR Part 172)? ***No***

262.32 (a) & (b)
c. Not marking each container of 110 gallons or less with the words "hazardous waste ------" or each package of hazardous waste in accordance with DOT regulations (49 CFR Part 172)? ***No***
If yes, explain:

262.33
3. Does the facility placard or offer the transporter placards for its hazardous waste shipments? ***Yes***

IV. Waste Accumulation

1. Does the facility use the following types of hazardous waste accumulation:

a. Satellite accumulation? ***Yes***

b. Less than 90 day storage? ***Yes***

Answer the following questions if the generator has satellite accumulation area(s).

262.34(c)(1)
2. Is the satellite area(s) near the point of waste generation and under the control of the operator of the process actually generating the waste? ***Yes***
If no, describe.

262.34(c)(1)
3. Are there multiple satellite accumulation areas for any one process that generate hazardous waste? ***Yes*** If yes, describe. **Multiple Bag House operations for each process.**

262.34(c)(1)
4. Is the waste stored in container(s)? ***Yes***

265.171
5. Are the container(s) in good condition? ***Yes***

262.34(c)(1)(ii)
6. Are container(s) marked with the words "hazardous waste" or with other words identifying the contents? ***Yes***

265.173(a)
7. Are container(s) kept closed? ***No***

265.171
8. Are container(s) leaking? ***No***
If yes, describe:

262.34(c)(1)
9. Has the facility accumulated more than 55 gallons of hazardous waste or more than 1 quart of acutely hazardous waste in a satellite accumulation area? ***Yes***
If yes, answer the following questions.

a. Are the container(s) holding excess waste dated as to when accumulation began? ***No***

b. Does the excess waste comply with the less than 90 day storage requirements (40 CFR Part 262.34(a)) within three days of the time when accumulation of such waste began? ***Unknown***

Answer the following questions if the facility has less than 90 day storage.

10. Does the facility maintain personnel training and other records required in 40 CFR Part 265.16? ***Yes***

If yes, do these records include:

265.16(d)(1)
a. Job title for each person related to hazardous waste management and the employees filling each job? ***Yes***

265.16(d)(2)
b. A written job description for each position? ***Yes***

265.16(d)(3)
c. A written description of the type and amount of training that will be given to each person? ***Yes***

265.16(d)(4)

d. Documentation that the training or job experience required by the facility personnel to effectively respond to emergencies and other wise manage hazardous waster in a proper manner has been successfully completed? ***Yes***

265.16(b)

11. Have facility personnel successfully completed the required training or job experience within six months after occupying the position? ***Yes***

265.1(c)

12. Do facility personnel take part in an annual review of initial training requirements and update them as necessary? ***Yes***

262.34(a)(4)

13. Does the facility maintain an adequate preparedness and prevention program as required in 40 CFR 265 Subpart C? ***Yes***

Is the facility equipped with:

265.32(a)

a. Internal communications or alarm system? ***Yes***

265.32(b)

b. Telephone or hand-held two way radio? ***Yes***

265.32(c)

c. Portable fire extinguishers or other fire control equipment, spill control equipment and decontamination equipment? ***Yes***

265.32(d)

d. Adequate volume of water? ***Yes***

265.33

14. Does the facility maintain the above equipment to assure its proper operation? ***Yes***

262.34(a)(4)

15. Has the facility prepared a contingency plan and is it maintained at the facility? ***Yes***

If yes, does it contain the following:

a. Descriptions of the actions that are to be taken in case of an emergency (all potential types of emergencies should be identified)? ***Yes***

b. Description of arrangements made with local authorities? ***Yes***

c. Current list of emergency coordinator names, addresses and phone numbers (office and home)? ***Yes***

d. List of all emergency coordinators names, addresses and phone numbers (office and home)? ***Yes***

e. Evacuation plan for facility personnel? ***Yes***

The inspector should obtain a copy of the facility's contingency plan if problems are found.

265.53(b)
16. Were copies of the contingency plan presented to local authorities that may provide emergency services? ***Yes***

17. Has the facility's contingency plan ever failed in an emergency? ***No***
If yes:

265.54(b)
a. Was the contingency plan immediately amended? ***N/A***

265.56(j)
18. If the contingency plan is implemented, does the facility record the incident in its operating log and submit a written report of the incident to the appropriate state agency? ***N/A***

262.34(a)(1)
19. What is the method of hazardous waste storage:
Containers? ***Yes***
Tanks? ***Yes***
Other? ***Yes***

262.34(a)(2)&(3)
20. Are the container(s) marked with the words "Hazardous Waste" and the date that accumulation in that container began? ***No, one container not dated in less than 90 day storage area.***

262.34(a)
21. Based upon accumulation dates, have any container(s) been in storage more than 90 days?
No If yes, inspector should complete the appropriate TSD checklists.

265.171
22. Are container(s) in good condition? ***Yes***
If no, explain:

265.172
23. Are containers made out of or lined with materials which will not react with or be incompatible with the wastes they are storing? ***Yes***

265.173(a)
24. Are containers kept closed? ***No***

265.171
25. Are any container(s) leaking? ***No***
If yes, describe:

265.174
26. Are container storage area(s) inspected at least weekly and is an adequate inspection record/log maintained? ***No***
If no, explain: ***The containers are stacked in a manner which precludes inspection. A weekly inspection log is maintained.***

265.35
27. Is adequate isle space maintained? ***No***
If no explain: ***There was no isle space between containers.***

265.176
28. Are container(s) holding ignitable or reactive waste located at least 15 meters (50 feet) from the facility's property line? ***Yes***

29. Are incompatible wastes placed in the same container(s)? ***No***
If yes, explain:

265.177(a)
a. Is there any evidence that conditions of extreme heat or pressure, fire or explosion, violent reactions or toxic emissions occurred. ***No*** If yes, describe:

265.177(c)
30. Are container(s) holding incompatible hazardous wastes properly separated or protected from one another while in storage? ***N/A***

Answer the following questions if the facility uses tank storage:

262.34(a)(3)
31. Is the tank(s) labeled or clearly marked with the words "Hazardous Waste"? ***The four above ground tanks in the waste water treatment area were marked; however, there were no marking to indicate the presence of hazardous waste in what the facility representative described as a self contained sump in the waste water treatment area which is utilized for the collection of contaminated wash water.***

262.34(a)
32. Is the tank(s) marked with the date that accumulation began in the tank(s) or does the facility have in its records when waste accumulation started in the tank(s). ***Above ground tanks were empty at time of inspection. The contaminated waste water collection sump was being utilized at the time of the inspection.***

262.34(a)
33. Based upon start accumulation dates, has the facility stored hazardous waste in tank(s) for more than 90 days? ***No***
If yes, complete the appropriate TSD checklist.

34. Which of the following describes the tank(s) employed at this facility (highlight appropriate response(s))?

a. Indoor - not on an impermeable floor

b. Indoor - on impermeable floor

c. Outdoor - above ground

d. Outdoor - in ground

e. Outdoor - underground

f. Other (indoor underground tank)

35. What is the approximate age of the tank(s)? ***18 Years - The four tanks are utilized to hold contaminated wash water from a self contained sump. The wash water is pumped to the tanks just prior to the arrival of the tanker truck which removes the wash water for disposal. The use of the tanks allows quick loading of the tanker truck thus providing an economic benefit.***

265.191
36. Does the tank(s) appear to be in good condition? ***Yes***
If no, describe:

265.191
37. Is the tank(s) leaking? ***No***
If yes, describe:

265.193
38. Is the tank(s) provided with an effective secondary containment system? ***Yes***

265.191(b)
39. Was a leak test performed on the tank(s)? ***Unknown***

265.194(b)
40. Is the tank(s) provided with adequate controls to prevent spills or overflows (i.e. automatic feed cutoff, bypass to another unit, high level alarms, etc.) ***No, tank manually filled.***

265.194(b)
41. Is there sufficient freeboard (2 feet) in uncovered tank(s) to prevent overtopping by wave or wind action or precipitation? ***N/A***

265.195(a)
42. Is tank(s) inspected each operating day? ***Yes, when being utilized.***

If yes, do inspections include:

265.195(a)(1)
a. Overfill/spill control equipment? ***No***

265.195(a)(2)
b. Above ground portions of the tank(s) for corrosion or releases? ***Yes***

265.195(a)(3)
c. Data gathered from monitoring equipment and leak detection equipment? ***N/A***

265.195(a)(4)
d. Area immediately surrounding the external accessible portion of the tank(s) and secondary containment system for signs of erosion and releases? ***Yes***

265.195(b)(4)
43. Does this facility perform annual inspections of the cathodic protection system, if present? ***N/A***

265.195(c)
44. Does the facility properly document all of the results of its tank system inspections? ***Yes***

265.196
45. Is there any indication that the facility did not properly respond to spills or leaks from a tank(s) (this would include failure to stop the spill/leak, failure to clean up spilled/leaked material, failure to minimize migration, failure to remove tank(s) from service immediately, failure to provide notification, etc.)? ***No***
If yes, describe:

46. Does the facility store any ignitable or reactive waste in the tank(s)? ***No***
If yes:

265.198(a)(1)
a. Is the waste treated, rendered or mixed before or immediately after placement in the tank(s) so that it no longer meets the definition of ignitable or reactive waste? ***N/A***

265.198(a)(2)
b. Is the waste stored in such a way that it is protective from any material or condition that may cause the waste to ignite or react? ***N/A***

265.198(a)(3)
c. Is the tank(s) used solely for emergencies? ***N/A***

265.198(b)
d. Does the tank(s) appear to be a safe distance from the facility's property line and public thoroughfares? ***Yes***
If no, describe:

47. Is there any indication that incompatible wastes are being stored in a tank(s)? ***No***

V. Record Keeping and Reports

262.42(a)(2)
1. Does the facility prepare and Exception Report and submit it to the Regional Administrator if a signed copy of the manifest is not received within 45 days of the date the waste was accepted by the initial transporter? ***N/A***
If yes:

a. Legible copy of the manifest?

b. Cover letter explaining generators efforts to locate waste and the result of those efforts?

262.41(a)
2. If the facility ships any hazardous waste off-site, does it prepare a Biennial Report and submit it to the Regional Administrator by March 1 of each even numbered year. ***Yes***

If yes, does the Biennial Report include:

262.41(a)(3)
a. EPA ID number for each off-site TSD facility to which waste was shipped during the year? ***Yes***

262.41(a)(4)
b. EPA ID number for each transporter used during the year? ***Yes***

262.41(a)(5)

c. Description and quantity of each hazardous waste shipped off-site (listed by EPA ID number of each TSD facility to which it was shipped)? ***Yes.***

262.41(a)(6)

d. Efforts undertaken during the year to reduce the volume and toxicity of the waste generated? ***No***

262.41(a)(7)

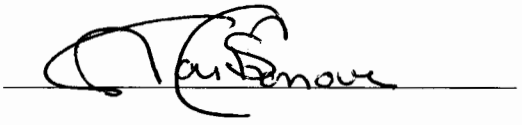
e. Description of the changes in volume and toxicity of the waste actually achieved during the year? ***No***

262.40(a)(b)(c)

3. Does the facility retain copies of Biennial Reports, Exception Reports and test results/waste analysis for a minimum of three years from the date the waste was last sent to on-site or off-site treatment, storage or disposal? ***Yes***

Additional Comments:

Inspectors Name: ***Clark S. Conover***
Title: ***Environmental Scientist***
Agency: ***USEPA***
Office Location: ***Wheeling, WV***
Date of Inspection: ***6/18/08***



Clark S. Conover

July 1, 2008
Date